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June 11, 1999  
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**JUN 11 1999**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation in Revision of the Commission's  
Rules to Ensure Compatibility with Enhanced 911  
Emergency Calling Systems, CC Docket No. 94-102

Dear Ms. Salas:

On May 25, 1999, on behalf of TruePosition, Inc., a notice of ex parte presentation was filed, and the attached article was inadvertently omitted. Pursuant to 47 C.F.R. § 1.1206, two copies of this letter and the attached article, which was distributed during the meeting, are being submitted.

Respectfully submitted,

  
Antoinette Cook Bush

Counsel for TruePosition, Inc.

cc: (w/o attachments)  
James Schlichting  
Daniel Grosh  
Nancy Booker  
Julie Buchanan

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Wireless Week

5/10/99

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COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Article Raises Phase II Issues  
In Wake Of Houston Situation**

This is in response to your "Phase II Not Ready?" article (April 26 issue, page 1) regarding Greater Harris County's implementation of TruePosition's FCC's phase II E911 service.

First, the Houston deployment and results confirm that TruePosition's solution is "ready for prime time." For almost three months, TruePosition has been locating every one of 830,000 analog cellular calls in all types of weather conditions from all types of locations.

Second, TruePosition has been able to locate accurately those calls: 67 percent within 85 meters (280 feet), 60 percent within 61 meters (200 feet), 36 percent within 30 meters (100 feet) and 22 percent within 15 meters (50 feet). TruePosition exceeded the county network's requirements and has complied with the FCC's phase II rules. [Those rules require] that each and every 911 call including roamer calls be located within an accuracy of 125 meters using the specified root mean square methodology.

Third, TruePosition does not have difficulty locating a cellular caller at the "edges of cell sites" as the article states. TruePosition was authorized only to deploy in a limited area, but in any event, it can locate equipment beyond the boundaries of a cellular system, ensuring complete coverage throughout the system.

Fourth, the county network has acknowledged accuracy of the TruePosition system and is ready to deploy it fully. No performance concerns or "technical issues" have given the county any pause.

Michael Amarosa  
Vice President of Public Affairs  
TruePosition Inc.  
Washington, D.C.

*Reply: Wireless Week requested specific data on system location accuracy from TruePosition, Houston Cellular and the network, but data was not made available by press time. The FCC requires carriers to identify callers' locations with an accuracy of 125 meters RMS. If calls are "normally" distributed, 67 percent of the call locations would be accurately identified. If call distributions are more skewed, with higher errors, the requirement would be higher than 67 percent.*

Several statements in the [phase II] article are of considerable concern to us.

I would first like to comment on the statement [regarding] the legality of a dispatch (or 911) agency's seeking phase II 911 wireless service prior to 2001. The FCC order specifically states that 911 needs will be met by 2001; it certainly does not indicate anywhere that agencies and carriers must wait until 2001. From a public-safety perspective, waiting would be a tremendous disservice to citizens because the location of their wireless 911 call is unknown.

The dispatchers and call-takers serving the area served by the Greater Harris County network (two counties, 48 cities, including Houston) tell us that their greatest frustration on the job is emergency calls from wireless phones [whose location cannot be identified]. The burden on public-safety agencies, both in terms of time and personnel, is overwhelming. Up to 30 percent of emergency calls to 911 in our service area are placed from wireless phones. Some of these calls have [required] up to an hour and a half to locate the caller.

More lives can be saved today by moving forward with the wireless pilot project agreed to by the net-

work and Houston Cellular. It is ready to turn on.

I find it ludicrous that wireless carriers peddle their cell phones to citizens for personal safety, but attempt to stop an effort to improve what those cell phones can offer to citizens.

In response to the comment that the cost-recovery mechanisms may prove insufficient: until someone builds it, we (the 911 community and the wireless industry) will not know exactly what it will take. I find it interesting that the "Texas surcharge" was referred to as a "paltry \$0.50 per month." At the January beginning of the Texas Legislative Session, plans of many of us in the 911 community were to seek an increase in that surcharge. Informally, but forcefully, we were put on notice that if we attempted to increase that surcharge, the wireless industry would strenuously oppose the increase.

Laverne Hogan  
Executive Director  
Greater Harris County  
911 Emergency Network

*Reply: To clarify the FCC's rules, "a covered carrier has an obligation to deploy location technology within 6 months after notification by the public-safety answering points, if such notification occurs less than 6 months before the required implementation date." As the FCC has interpreted the rule for Wireless Week, a carrier receiving a PSAP request for phase II service three months before the deadline would be allowed three additional months to deploy. Also, in the last paragraph of the article, Wireless Week paraphrased a network representative who said one of the purposes of the test was to determine actual E911 deployment costs. •*